

Saskowski, Ronald

From: Miller, Scott
Sent: Friday, June 12, 2015 7:54 AM
To: Saskowski, Ronald
Subject: FW: TDEC Comments RE SMS draft RI/FS
Attachments: 47559TDECcommentltrdraftRI-FS_2015.pdf

Good morning, Ron,
Please save this to SEMS for Smokey Mountain Smelters.
Thank you,
Scott

From: Lee Barron [mailto:Lee.Barron@tn.gov]
Sent: Thursday, June 11, 2015 4:22 PM
To: Miller, Scott; Kestle, Rusty
Cc: Erin F. Sutton
Subject: TDEC Comments RE SMS draft RI/FS

Gentlemen:

Attached to this e-mail are the comments of the TDEC-DoR to the draft RI/FS for the Smokey Mountain Smelters Site.

Lee Barron, PG, CHMM
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Knoxville, TN 37921
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June 11, 2015

Scott Miller, RPM
Superfund Restoration & Sustainability Section
U.S. EPA - Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303

RE: TDEC-DoR Comments on the Draft Remedial Investigation/Feasibility
Study for the Smokey Mountain Smelters Site, Knoxville, Knox
County, Tennessee, TDEC-DoR Site No: 47-559

Dear Mr. Miller:

This letter is to present the comments of the Tennessee Department of Environment and Conservation-Division of Remediation (TDEC-DoR) regarding the draft Remedial Investigation/Feasibility Study for the Smokey Mountain Smelters Site and prepared by J.M. Waller & Associates on behalf of the U.S. Environmental Protection Agency. As was stated in our telephone conversation of this morning, the primary comment regards the provision for additional ground water treatment through injections of Sodium Bicarbonate to adjust the pH of the water as outlined in the preferred alternative in the Feasibility Study portion of the report. The TDEC-DoR feels that additional information regarding the natural buffering capacity of the aquifer beneath the site is required before it can be determined if additional ground water treatment is necessary. It is our understanding from your comments that the U.S. EPA would conduct this study of the natural buffering capacity of this aquifer during the Remedial Design phase of this project, if this proposed remedial alternative was actually selected in the Record of Decision.

The Remedial Investigation portion of the report appears to have adequately defined the nature and extent of the contamination present at this site. Additionally, the Human Health Risk Assessment portion of the report was considered adequate with the exception of a lack of consideration of the potential exposure to off-site ground-water receptors, and the potential ground water exposure risk to on-site construction workers, when engaged in conducting deep drilling or excavation activities. Furthermore, we feel that overly conservative risk assumptions were made evaluating the vapor intrusion

pathway, but that the overall conclusion that the site poses an elevated vapor intrusion risk to future site workers or residents is still valid.

The TDEC-DoR appreciates this opportunity to provide comments to the U.S. Environmental Protection Agency regarding this draft Remedial Investigation/Feasibility Study. If you have any further questions or comments regarding this matter, please contact me. I can be reached at the address on the letterhead, by telephone at 865-594-5482, or via e-mail at lee.barron@tn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "William Lee Barron", followed by a long horizontal flourish.

William Lee Barron, CHMM
TDEC-Division of Remediation

cc: TDEC-DoR/NCO